

U.S. Department of Justice

Washington, DC 20530

Received by NSD/FARA Registration Unit 07/30/2020 7:56:09 PM

Exhibit A to Registration Statement

**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

**1. Name and Address of Registrant**

Kivvit, LLC  
222 W. Merchandise Mart Plaza, Suite 2400, Chicago, IL 60654

**2. Registration No.**

6839

**3. Name of Foreign Principal**

Gilbert R. Chagoury

**4. Principal Address of Foreign Principal**

21 bis Avenue D'léna  
Paris, France 75116

**5. Indicate whether your foreign principal is one of the following:**☐ Government of a foreign country<sup>1</sup>☐ Foreign political party☐ Foreign or domestic organization: If either, check one of the following:☐ Partnership☐ Committee☐ Corporation☐ Voluntary group☐ Association☐ Other (*specify*) \_\_\_\_\_☒ Individual-State nationality Nigerian, Lebanese**6. If the foreign principal is a foreign government, state:**

a) Branch or agency represented by the registrant

b) Name and title of official with whom registrant deals

**7. If the foreign principal is a foreign political party, state:**

a) Principal address

b) Name and title of official with whom registrant deals

c) Principal aim

<sup>1</sup> "Government of a foreign country," as defined in Section 1(e) of the Act, includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction is backed by the United States or has not been recognized by the United States.

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8. If the foreign principal is not a foreign government or a foreign political party:

a) State the nature of the business or activity of this foreign principal.

Gilbert R. Chagoury is an industrialist, ambassador, advisor and philanthropist. (www.gilbertchagoury.com)

b) Is this foreign principal:

See attachment.

Supervised by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Owned by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Directed by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Controlled by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Financed by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Subsidized in part by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

9. Explain fully all items answered "Yes" in Item 8(b). *(If additional space is needed, a full insert page must be used.)*

See attachment.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

### EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit A to the registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date of Exhibit A	Name and Title	Signature
May 19, 2020		/s/ Eric Sedler
		eSigned

**Attachment to Exhibit A**

Although the representation was initiated and ultimately terminated at the direction and control of the foreign principal, Mr. Gilbert R. Chagoury, Mr. Chagoury also directed that the registrant communicate with officials of the government of Nigeria, support the activities of the government, and seek review and approval of work product for the project from government officials during the period in which the registrant operated at the direction and control of Mr. Chagoury.



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Exhibit B to Registration Statement

**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

**INSTRUCTIONS.** A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <https://www.fara.gov>.

**Privacy Act Statement.** The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

**Public Reporting Burden.** Public reporting burden for this collection of information is estimated to average .32 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant	2. Registration Number
Kivvit LLC	6839

## 3. Name of Foreign Principal

Gilbert R. Chagoury (through Corallo Media Strategies, Inc.)

Check Appropriate Box:

4. ☒ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
6. ☐ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
7. What is the date of the contract or agreement with the foreign principal? 12/15/14
8. Describe fully the nature and method of performance of the above indicated agreement or understanding.

See attached contract between registrant and Corallo Media Strategies, Inc. During the term of the contract, the registrant was known as ASGK Public Strategies LLC.

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FORM NSD-4  
Revised 05/20

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9. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

The registrant provided public relations and communications services through Corallo Media Strategies, Inc., including conducting media monitoring and developing media clips; drafting and posting social media content; drafting materials including articles, fact sheets, and background materials; and engaging with U.S. think tanks, NGOs, and foreign policy experts.

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10. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act<sup>1</sup>.Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

The registrant sought to promote the agenda and accomplishments of then-President of Nigeria, Goodluck Jonathan, particularly regarding issues related to Boko Haram, the economy, response to Ebola, education, transparency, and accountability.

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11. Prior to the date of registration<sup>2</sup> for this foreign principal has the registrant engaged in any registrable activities, such as political activities, for this foreign principal?Yes ☒ No ☐

If yes, describe in full detail all such activities. The response should include, among other things, the relations, interests, and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored, or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers, and subject matter. The response must also include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's activities, including political activities.

See attachment.

Set forth below in the required detail the registrant's political activities.

Date	Contact	Method	Purpose
See attachment.			

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12. During the period beginning 60 days prior to the obligation to register<sup>3</sup> for this foreign principal, has the registrant received from the foreign principal, or from any other source, for or in the interests of the foreign principal, any contributions, income, money, or thing of value either as compensation, or for disbursement, or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail an account of such monies or things of value.

Date Received	From Whom	Purpose	Amount/Thing of Value
See attachment.			

Total

13. During the period beginning 60 days prior to the obligation to register<sup>4</sup> for this foreign principal, has the registrant disbursed or expended monies in connection with activity on behalf of the foreign principal or transmitted monies to the foreign principal?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately an account of such monies, including monies transmitted, if any.

Date	Recipient	Purpose	Amount
See attachment.			

<sup>1</sup> "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

<sup>2,3,4</sup> Pursuant to Section 2(a) of the Act, an agent must register within ten days of becoming an agent, and before acting as such.

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**EXECUTION**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit B to Registration Statement, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

7/30/2020

Eric Sedler

DocuSigned by:

Eric Sedler

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December 15, 2014

Mark Corallo  
Corallo Media Strategies  
520 N. Washington Street  
Alexandria, VA 22314

Re: ASGK Public Strategies Engagement

Dear Mr. Corallo:

This letter will formalize ASGK Public Strategies (ASGK) engagement with Corallo Media Strategies (Client) for a public relations project regarding Nigeria.

The engagement embodied in this letter and the performance of services shall be on the following terms and conditions:

1. ASGK will provide these services at a project cost of \$300,000 for six months (Dec 15, 2014 – June 15, 2015), with the option to extend as decided by the parties.
2. An initial payment of 50 percent of the project cost -- \$150,000 -- will be paid to ASGK by January 15, 2015.
3. The remaining project cost will be billed through a monthly retainer of \$50,000 from April 1, 2015 through June 1, 2015.
4. ASGK will submit invoices to the Client including a summary of work expended and details of expenses and costs incurred. Any expenses over \$250 will require pre-approval by Client. Invoices will be due within 30 days of receipt.
5. ASGK will not accept any engagement that poses a potential conflict of interest with its work on this matter unless any such potential conflict is waived in advance in writing by Client.
6. Consultant will adhere to the highest professional standards in the conduct of its work on this matter.

This letter is made effective as of December 15, 2014. Any party may terminate this engagement upon 30 days written notice to all parties.

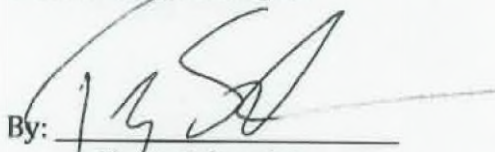


The parties are unaware of any conflicts of interest that would impede or render inappropriate the engagement embodied by this letter. If any party becomes aware of such a conflict, it shall notify all other parties promptly and the parties shall work together in good faith to resolve potential conflict.

If you have any questions, please do not hesitate to contact me. Otherwise, please sign and return the enclosed copy of this letter at your earliest convenience.

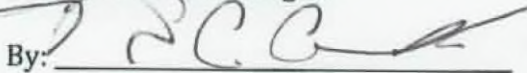
Very truly yours,

ASGK Public Strategies

By:   
Tracy Schmalzer  
Managing Director

AGREED:

Corallo Media Strategies

By: 

Printed Name: MARK C CORALLO

Title: PRESIDENT

Date: 12/15/14

**Exhibit B Attachment for Gilbert R. Chagoury****December 15, 2014 - June 15, 2015 (terminated)**

As a retrospective amendment, the information contained in this filing was assembled to the best of the registrant's ability after reasonable due diligence. Certain historical information was unavailable after reasonable due diligence.

**Item 11**

Registrant engaged in a public relations campaign designed to highlight then-Nigerian President Goodluck Jonathan's successes and position him positively with U.S. audiences in connection with the 2015 Nigerian presidential election. The registrant provided public relations and communications services through Corallo Media Strategies Inc., including conducting media monitoring and developing media clips; drafting and posting social media content; drafting materials including articles, fact sheets, and background materials; and engaging with U.S. think tanks, NGOs, and foreign policy experts.

In January 2015, the registrant developed an op-ed, which was eventually published in *USA Today*, regarding President Jonathan's response to the Ebola crisis and lessons learned in Nigeria's successful eradication of the disease. In March 2015, registrant arranged and attended meetings between Nigerian government officials (Hassan Tukur, chief of staff to President Jonathan; Mustafa Chike-Obi, economic advisor to President Jonathan) and representatives of U.S. think tanks, nongovernmental organizations, and other foreign policy experts.

**Item 12**

<b>Date</b>	<b>From Whom</b>	<b>Purpose</b>	<b>Amount</b>
1/13/2015	Corallo Media Strategies, Inc.	Fees	\$150,000
3/30/2015	Corallo Media Strategies, Inc.	Fees	\$150,000
3/30/2015	Corallo Media Strategies, Inc.	Expenses	\$762.25
			<b>Total: \$300,762.25</b>

**Item 13**

<b>Date</b>	<b>To Whom</b>	<b>Purpose</b>	<b>Amount</b>
12/18/2014	Amtrak	Travel to New York for client meeting (Schmaler).	\$554.00
12/22/2014	Uber	Travel to New York for client meeting (Schmaler).	\$5.72
12/23/2014	Amtrak	Travel to New York for client meeting (Schmaler).	\$53.00
1/8/2015	Uber	Travel to Paris, France for client meeting (Schmaler).	\$58.50
1/11/2015	Regency Cab	Travel to Paris, France for client meeting (Schmaler).	\$91.03
			<b>Total: \$762.25</b>